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11 Attorneys for Receiver  
12 **ROBB EVANS OF ROBB EVANS &  
ASSOCIATES LLC**

13  
14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**  
16

17 FEDERAL TRADE COMMISSION,

18 Plaintiff,

19 v.

20 JEREMY JOHNSON, individually, as officer  
of Defendants I Works, Inc., etc., et al.,

21 Defendants.  
22

Case No. 2:10-CV-02203-MMD-GWF

**~~PROPOSED~~ ORDER TO SHOW CAUSE  
AS TO WHY SOPHIA DALEY, JEREMY  
JOHNSON AND RICHARD H. CASPER  
SHOULD NOT BE HELD IN CONTEMPT  
OF COURT FOR VIOLATION OF THE  
PRELIMINARY INJUNCTION ORDER**

23 The matter of the Motion for Issuance of An Order to Show Cause as to Why Sophia  
24 Daley, Jeremy Johnson and Their Counsel Richard H. Casper Should Not Be Held in Contempt of  
25 Court for Violation of the Preliminary Injunction Order ("OSC Application") came on before the  
26 Court for determination, the Honorable Miranda M. Du, United States District Judge presiding.  
27 The Court, having reviewed and considered the OSC Application and the pleadings and papers  
28 filed in support thereof, and good cause appearing therefor,

**ORDER TO SHOW CAUSE AS TO SOPHIA DALEY, JEREMY JOHNSON AND  
RICHARD H. CASPER**

IT IS ORDERED that Sophia Daley ("Daley"), defendant Jeremy Johnson ("Johnson") and Richard H. Casper ("Casper"), and each of them, shall appear in person before this Court for a hearing to be conducted commencing at 1:30 PM .m. on February 11, 2016, 2015 in Courtroom TBA of this Court located at 333 Las Vegas Boulevard South, Las Vegas, Nevada 89101, and shall there and then show cause as to why Daley, Johnson, and Casper, and each of them, should not be held in contempt of court for violations of Sections XIX and XX of the Preliminary Injunction Order entered February 10, 2011 ("Preliminary Injunction") as described in the Receiver's OSC Application, including but not limited to the following:

A. The filing of the Motion for Leave to Amend Complaint and Join Parties by Daley ("Motion to Amend") filed in the action *Sophia Daley v. Paradise Ranch Development, LLC, et al.*, Case No. 150500478 pending in the Fifth District Court for Washington County, Utah ("Utah Action"), together with the supporting Memorandum with a proposed amended complaint attached to the Memorandum in the Utah Action with knowledge of the Preliminary Injunction;

B. The continued prosecution of the Motion for Leave to Amend Complaint and Join Parties by Daley from and after October 7, 2015 when the Receiver's counsel issued its demand in writing to Casper to withdraw the Motion to Amend and/or dismiss the proposed amended complaint to the extent that it named as defendants and sought relief against Robb Evans and Robb Evans of Robb Evans & Associates LLC; and

IT IS FURTHER ORDERED that upon a finding that Daley, Johnson and/or Casper is in contempt of Court, individually or jointly (the "Contempt Order"), the Court will consider, without limitation, the following relief:

A. An order directing Daley, Johnson and/or Casper to take all steps necessary and/or appropriate to cause the Motion to Amend to be withdrawn and/or the proposed revised amended complaint in the Utah Action to be dismissed to the extent the proposed revised amended complaint asserts claims for relief against Robb Evans and/or Robb Evans of Robb Evans & Associates LLC within two business days of the date of entry of the Contempt Order;

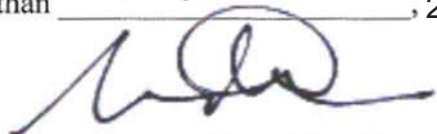
B. An order directing Daley, Johnson and Casper, jointly and severally, to pay to the Receiver on behalf of the receivership estate from non-receivership assets and from sources of funds that do not originate from assets of the Receivership Defendants the amount of all fees and expenses of the Receiver's counsel incurred by the receivership estate in connection with the preparation, filing and prosecution of the OSC Application and the proceedings leading up to and including the issuance of the Contempt Order, according to proof; and

IT IS FURTHER ORDERED that service of this Order to Show Cause shall be effectuated by the Receiver on Daley by: (a) service of this Order on her counsel Richard H. Casper at the business address of the Richard H. Casper, P.C., 5420 South Green Street, Murray, Utah, by overnight mail service for receipt by no later than January 22, 2016. and (b) by personal service to be effectuated prior to the hearing on this Order to Show Cause; and

IT IS FURTHER ORDERED that service of this Order to Show Cause shall be effectuated by the Receiver on Johnson by: (a) service of this Order on his counsel Richard H. Casper at the business address of the Richard H. Casper, P.C., 5420 South Green Street, Murray, Utah, by overnight mail service for receipt by no later than January 22 2016. (b) service of this Order by overnight mail delivery service on Johnson addressed to him at his residence at 529 S. Woodview Circle, St. George, Utah for receipt by no later than January 22, 2016; and (c) by personal service to be effectuated prior to the hearing on this Order to Show Cause; and

IT IS FURTHER ORDERED that service of this Order to Show Cause shall be effectuated by the Receiver on Casper by: (a) service of this Order on his business address to the attention of Richard H. Casper at the business address of the Richard H. Casper, P.C., 5420 South Green Street, Murray, Utah, by overnight mail service for receipt by no later than January 22, 2016, 2015; and (b) by services of this Order on Casper by electronic mail at rhcasper@csolutions.net by no later than January 29, 2016.

Dated: December 7, 2015



MIRANDA M. DU  
United States District Court Judge



**CERTIFICATE OF SERVICE**

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 300 S. Grand Avenue, Suite 1400, Los Angeles, CA 90071.

On November 10, 2015, I served the **[PROPOSED] ORDER TO SHOW CAUSE AS TO WHY SOPHIA DALEY, JEREMY JOHNSON AND RICHARD H. CASPER SHOULD NOT BE HELD IN CONTEMPT OF COURT FOR VIOLATION OF THE PRELIMINARY INJUNCTION ORDER** upon the parties and/or counsel listed and by the methods indicated on the attached Service List.

I declare upon the penalty of perjury that the foregoing is true and correct, and that I am employed in the office of a member of the bar of this Court at whose direction the service was made. Executed on November 10, 2015 at Los Angeles, California.

/s/ Christina O'Meara  
Christina O'Meara

## SERVICE LIST

The following CM/ECF participants were served by electronic means on November 10, 2015:

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- **Ava Bessel**  
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- **Alan D. Boyack**  
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@usdoj.gov

23 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be  
24 sent from e-mail address chris.o'meara@dentons.com to rhcasper@csolutions.net. I did not  
25 receive, within a reasonable time after the transmission, any electronic message or other indication  
26 that the transmission was unsuccessful.

27 The following non-CM/ECF participants were served by first-class mail, postage prepaid  
28 on November 10, 2015:

Ryan Riddle  
446 East 1410 South  
Washington, UT 84780

Bryce Payne  
2399 East Bella Rosa Circle  
St. George, UT 84780



1 Loyd Johnston  
 2 110 North 200 East  
 3 PO Box 44  
 Kanosh, Utah 84637

Tara-Lynn Adams  
 2152 Starline Meadow Place  
 Las Vegas, NV 89139

4 Kevin R Pilon.  
 5 P.O. Box 387  
 94 Grand Harbor Drive  
 Grand River, Ohio 44045-0387

Scott Leavitt  
 2271 Southgate Hills Drive  
 St. George, UT 84770

6 Andy Johnson  
 7 3641 Vista View Circle  
 8 Santa Clara, UT 84765

Richard H. Casper  
 Richard H. Casper, P.C.  
 5420 South Green Street  
 Murray, Utah 84123

9 Sophia Daley  
 10 c/o Richard H. Casper, P.C.  
 5420 South Green Street  
 Murray, Utah 84123

12 **SPECIAL NOTICE PARTIES -- MAIL**

13 Aaron D. Randall  
 14 Hughes, Thompson, Randall & Mellen, P.C.  
 187 North 100 West  
 Saint George, UT 84770

16 **TAXING AGENCIES -- MAIL**

17 California Franchise Tax Board  
 18 Special Procedures – BE Bankruptcy  
 MSA-345  
 P.O. Box 2952  
 19 Sacramento, CA 95812-2952

Idaho State Tax Commission  
 P.O. Box 36  
 Boise, ID 83722-0410

20 Internal Revenue Service  
 21 Ogden, UT 84201-0039

Massachusetts Department of Revenue  
 P.O. Box 7000  
 Boston, MA 02204

22 Montana Department of Revenue  
 23 P.O. Box 8021  
 Helena, MT 59604

Nevada Department of Taxation  
 1550 College Parkway  
 Carson City, NV 89706

24 Oklahoma Tax Commission  
 25 2501 North Lincoln Boulevard  
 Oklahoma City, OK 73194

Sevier County Treasurer  
 250 North Main Street  
 Richfield, UT 84701

26 State of Arizona  
 27 Department of Revenue  
 P.O. Box 29009  
 Phoenix, AZ 85038

State of Arkansas – Corporate Income Tax  
 Section  
 P.O. Box 919  
 Little Rock, AR 72203



1	Utah State Tax Commission	Washington County Assessor
	210 North 1950 West	87 North 200 East, Suite 201
2	Salt Lake City, UT 84134	St. George, UT 84770
3	Internal Revenue Service	Los Angeles County Tax Collector
	Attn: J. Daugherty MS/5028LVG	225 North Hill Street, Room 122
4	110 North City Parkway	Los Angeles, CA 90012
	Las Vegas, NV 89106	
5		
	Arkansas Secretary of State	California Secretary of State
6	State Capitol	1500 11 <sup>th</sup> Street, 3 <sup>rd</sup> Floor
	Room 256	Sacramento, CA 95814
7	Little Rock, AR 72201	
8	State of California Board of Equalization	State of CA Employment Development Dept.
	Ms. Eve Lee	Attn: John Arnold
9	450 N Street, MIC 55	7677 Oakport Street, Suite 400
	Sacramento, CA 95814	Oakland, CA 94621
10		
	State of Delaware Division of Corporation	Utah Department of Workforce Services
11	P.O. Box 898	P.O. Box 45249
	Dover, DE 19903	Salt Lake City, UT 84145-0249
12		
	City of St. George Utilities	Employment Development Department
13	P.O. Box 1750	P.O. Box 82615
	St. George, UT 84771-1750	MIC 3A
14		Sacramento, CA 94280-0001
15	New York State Department of Labor	New York State Division of Corporations
	Building 12	99 Washington Avenue, 6 <sup>th</sup> Floor
16	W.A. Harriman Campus	Albany, NY 12231
	Albany, NY 12240	
17		
	David Willcox, Revenue Officer	
18	Nevada Department of Taxation	
	Attn: Bankruptcy Section	
19	555 E Washington Ave #1300	
	Las Vegas, NV 89101	
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